

# **EXHIBIT R**

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

JAA DOE,

Plaintiff,

v.

Index No. 952242/2023

NEIL PORTNOW; NATIONAL ACADEMY OF  
RECORDING ARTS & SCIENCES, INC.; and  
DOES 1-5 whose identities are unknown to  
Plaintiff,

Defendants.

**RESPONSE TO REQUEST FOR STATEMENT OF DAMAGES  
PURSUANT TO CPLR 3017(C)**

Plaintiff, JAA Doe, by and through undersigned counsel, responds to Defendant, National Academy of Recording Arts & Sciences, Inc.'s, Request for Statement of Damages pursuant to C.P.L.R. 3017(c), as follows:

Plaintiff is entitled to \$10,000,000 for past and future pain and suffering, loss of enjoyment of life and future medical expenses.

/s/ Jeffrey R. Anderson

Jeffrey R. Anderson

Trusha Goffe

J. Michael Reck

Nahid A. Shaikh

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